the difference between ordinary chattels and money. A depositor in a bank loses title to the money, but a depositor of chattels in a warehouse or grain in an elevator retains the title.

JUDGMENTS — OPERATION AS BAR TO OTHER ACTIONS — DAMAGE TO PERSON AND PROPERTY CAUSED BY ONE NEGLIGENT ACT. — The plaintiff, while riding in his wagon, was run into by the defendant's trolley car and injured personally. His horse and wagon were also damaged, for which he recovered judgment. *Held*, that this bars an action for the personal injuries. *Ochs* v. *Public Service Ry. Co.*, 77 Atl. 533 (N. J., Sup. Ct.). See NOTES, p. 492.

PLEADING — DAMAGE TO PERSON AND PROPERTY BY ONE NEGLIGENT ACT AS ONE CAUSE OF ACTION. — The plaintiff sued to recover damages for personal injuries and damage to his horse and buggy, both sustained in a collision caused by the defendant's negligence. The defendant moved to state separately the alleged causes of action. *Held*, that there was but one cause of action stated. *Bilikan* v. *Columbus Railway and Light Co.*, 20 Oh. Dec. 609 (Ohio, Franklin Common Pleas). See NOTES, p. 492.

PLEADING — THEORY OF THE PLEADING. — The plaintiff in his complaint set forth a cause of action for negligence and then sought to amend so as to recover under a statute. *Held*, that he may do so. *Birt* v. *Southern R. Co.*, 69 S. E. 233 (S. C.). See NOTES, p. 480.

POLICE POWER — NATURE AND EXTENT — PROHIBITION OF PICKETING. — The plaintiff was arrested for violation of an ordinance making it a misdemeanor to picket for the purpose of intimidating, threatening, and coercing employees. He petitioned for a writ of *habeas corpus*. *Held*, that the writ should be denied as the statute is constitutional. *Ex parte Williams*, 111 Pac. 1035 (Cal., Sup. Ct.).

According to this case a man can commit a peaceable act of picketing not partaking of the character of a nuisance and be guilty of a criminal offense. Yet the decision seems sound, for within the police power there may be forbidden a fringe of acts harmless in themselves, without violation of the Fourteenth Amendment. Where a remedial act is broader in its scope than is absolutely essential for the public welfare it will not be overthrown, if a general uniformity is thereby attained which is necessary for its effectual administration. *Compagnie Française de Navigation à Vapeur* v. *Louisiana State Board of Health*, 186 U. S. 380.

RECEIVERS — LIABILITY FOR RECEIVERSHIP EXPENSES — FUNDS INSUFFICIENT. — The plaintiff was appointed a receiver in an action for the dissolution of a partnership. In carrying on the business he incurred expenses which the assets were insufficient to satisfy, and he therefore claimed reimbursement from the original parties. *Held*, that he cannot recover. *Boehm* v. *Goodall*, [1911] 1 Ch. 155.

A receiver is an officer of the court, appointed by it, and responsible to it alone. *In re Flowers & Co.*, [1897] 1 Q. B. 14. He is not an agent of the company and may be personally liable on the contracts he makes. *Burt, Boulton, & Hayward* v. *Bull*, [1895] 1 Q. B. 276. And the executory obligations of a corporation do not descend upon him unless he elects to assume them. *Central Trust Co.* v. *East Tennessee Land Co.*, 79 Fed. 19. His management is so distinct that liens exercisable against the company are not enforceable against him. *Whinney* v. *Moss Steamship Co.*, [1910] 2 K. B. 813. Hence the basis of the principal decision is the injustice in charging the receiver's expenses upon those having no control over him. A similar result is reached by some American courts. *Atlantic Trust Co.* v. *Chapman*, 208 U. S. 360. But others place the